

JUDGE KATHLEEN CARDONE

FILED

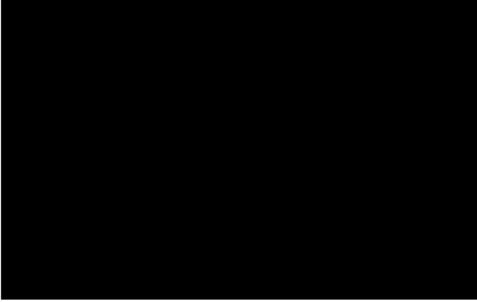
IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

KHALIL S. MAXWELL (1),  
also known as (a.k.a.) Korrupt,  
also known as (a.k.a.) Khalil Zerotolerance  
Maxwell,



Defendants.

§ **SE A L E D**  
 §  
 § **INDICTMENT**  
 §  
 § **CRIMINAL NO.**  
 §  
 § COUNT 1: 18 U.S.C. §§ 1591 (a)(1), (2),  
 § and (b)(1) –Sex Trafficking of Children  
 §  
 § COUNTS 2, 3, 4, 5: 18 U.S.C. §§  
 § 1591(a)(1), (2) and (b)(1) – Sex Trafficking  
 § by Force, Fraud, and Coercion  
 §  
 § COUNT 6, 7, 8, 9: 18 U.S.C. §§ 1591 (a)(1),  
 § (2), and (b)(2) –Sex Trafficking of Children  
 §  
 § COUNT 10: 18 U.S.C. § 2422 (b) –  
 § Coercion and Enticement of a Minor  
 §  
 § COUNT 11: 18 U.S.C. §§ 2252(a)(2) &  
 § (b)(1) - Receipt of a Visual Depiction  
 § Involving the Sexual Exploitation of a  
 § Minor  
 §  
 § COUNT 12: 18 U.S.C. § 1594 (c) –  
 § Conspiracy to Sex Traffic A Person  
 §  
 § COUNT 13: 18 U.S.C. §1591(d) –  
 § Obstruction of Sex Trafficking  
 § Enforcement  
 §  
 § **Notice of Government's Demand for**  
 § **Forfeiture**  
 §

EP 18 CR 0053

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))**  
**(Sex Trafficking of Children)**

Beginning on or about March 11, 2015 and continuing through on or about March 26, 2015 in the Western District of Texas and elsewhere, Defendants,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell, [REDACTED]**  
[REDACTED] [REDACTED] [REDACTED]

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain by any means a person, K.R., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, K.R., knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that K.R. had not attained the age of fourteen years (14), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

**COUNT TWO**  
**(18 U.S.C. § 1591(a)(1),(2) and (b)(1))**  
**(Sex Trafficking By Force, Fraud, and Coercion)**

Beginning on or about March 11, 2015 and continuing through on or about March 26, 2015 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, K.R., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, K.R., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause K.R., to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

**COUNT THREE**

**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))**

**(Sex Trafficking By Force, Fraud, and Coercion)**

Beginning on or about February 22, 2016 and continuing through on or about July 23, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, K.R., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, K.R., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause K.R., to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

**COUNT FOUR**

(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))  
(Sex Trafficking By Force, Fraud, and Coercion)

Beginning on or about March 6, 2016 and continuing through on or about September 13, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, M.T., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, M.T., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause M.T., to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

**COUNT FIVE**

(18 U.S.C. §§ 1591(a)(1), (2), and (b)(1))  
(Sex Trafficking By Force, Fraud, and Coercion)

Beginning on or about July 1, 2016 and continuing through on or about October 31, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, A.F., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported,

provided, obtained, advertised, maintained, patronized and solicited by any means a person, A.F., knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination thereof, would be used to cause A.F., to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), all in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

**COUNT SIX**

**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**  
**(Sex Trafficking of Children)**

Beginning on or about February 22, 2016 and continuing through on or about July 23, 2016 in the Western District of Texas and elsewhere, Defendants,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell, [REDACTED]**

[REDACTED]  
[REDACTED]  
[REDACTED]

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, K.R., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, K.R., knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that K.R. had not attained the age of eighteen years (18), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(2).

**COUNT SEVEN**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**  
**(Sex Trafficking of Children)**

Beginning on or about March 6, 2016 and continuing through on or about May 1, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell, [REDACTED]**  
[REDACTED]  
[REDACTED]  
[REDACTED]

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, M.T., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, M.T., knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that M.T. had not attained the age of eighteen years (18), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(2).

**COUNT EIGHT**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**  
**(Sex Trafficking of Children)**

Beginning on or about July 1, 2016 and continuing through on or about October 31, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, A.F., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, A.F., knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that A.F. had not attained the age of eighteen years (18), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(2).

**COUNT NINE**  
**(18 U.S.C. §§ 1591(a)(1), (2), and (b)(2))**  
**(Sex Trafficking of Children)**

Beginning on or about July 7, 2016, in the Western District of Texas and elsewhere,  
Defendant,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell,**

in and affecting interstate and foreign commerce, did knowingly recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize and solicit by any means a person, S.R., and did benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, advertised, maintained, patronized and solicited by any means a person, S.R., knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that S.R. had not attained the age of eighteen years (18), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(2).

**COUNT TEN**  
**(18 U.S.C. § 2422(b))**  
**(Coercion and Enticement of a Minor)**

Beginning on or about June 17, 2016 and continuing through on or about August 15, 2016 in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell,**

did use any facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce and attempt to persuade, induce, entice and coerce any individual, S.R., who had not attained the age of 18 years to engage in prostitution, all in violation of Title 18 United States Code Section 2422(b).

**COUNT ELEVEN**  
**(18 U.S.C. §§ 2252(a)(2) and (b)(1))**  
**(Receipt of a Visual Depiction Involving the Sexual Exploitation of a Minor)**

Beginning on or about July 5, 2016, in the Western District of Texas, and elsewhere, the Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell,**

did knowingly receive any visual depiction that had been mailed and transported in interstate and foreign commerce, and which contains materials which had been so transported, by any means including by internet, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, sections 2252(a)(2) and (b)(1).

**COUNT TWELVE**  
**(18 U.S.C. § 1594(c))**  
**(Conspiracy to Sex Traffic A Person)**

Beginning on or about March 11, 2015 and continuing through on or about October 31, 2016, in the Western District of Texas and elsewhere, Defendants,

**KHALIL S. MAXWELL (1),  
a.k.a Korrupt,  
a.k.a. Khalil Zerotolerance Maxwell,**

[REDACTED]

together with others, both known and unknown to the Grand Jury, knowingly conspired, combined, confederated and agreed with each other and others known and unknown to the Grand Jury, to commit certain offenses and violate certain laws of the United States, to wit:

- a) To knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain and maintain a person, knowing or in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, or any combination thereof, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1);
- b) To knowingly benefit, financially or by receiving anything of value, from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing and maintaining a person, in and affecting interstate commerce, knowing or in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, or any combination thereof, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Sections 1591 (a)(2) and (b)(1);

- c) To knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain and maintain a person, knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that the person had not attained the age of fourteen years (14), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).
- d) To knowingly benefit, financially or by receiving anything of value, from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing and maintaining a person, in and affecting interstate commerce, knowing that the person would be caused to engage in a commercial sex act as defined in Title 18, United States Code, Section 1591(e)(3), and after having a reasonable opportunity to observe the person, did knowingly and recklessly disregard the fact that the person had not attained the age of fourteen years (14), in violation of Title 18, United States Code, Sections 1591(a)(1),(2) and (b)(1).

All in violation of Title 18, United States Code, Section 1594(c).

**COUNT THIRTEEN**  
**(18 U.S.C. §1591(d))**  
**(Obstruction of Sex Trafficking Enforcement)**

Beginning on or about July 8, 2016, and continuing through and including on or about July 11, 2016, in the Western District of Texas and elsewhere, Defendant,

**KHALIL S. MAXWELL (1),**  
**a.k.a Korrupt,**  
**a.k.a. Khalil Zerotolerance Maxwell,**

obstructed, attempted to obstruct, in any way interfered with and prevented the enforcement of

Title 18, United States Code, Section 1591(a), Sex Trafficking of Children, all in violation of Title 18, United States Code, Section 159(d).

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

[*See Fed. R. Crim. P. 32.2.*]

This Notice of Demand for Forfeiture includes but is not limited to the property described below in Paragraphs IV and V.

**I.**

**Sex Trafficking Forfeiture Statues**  
[18 U.S.C. §§ 1594(d)(1) and (2)]

As a result of the foregoing criminal violations set forth in Counts One through Nine and Count Thirteen, the United States gives notice that it intends to forfeit any and all property from Defendants **KHALIL S. MAXWELL (1)**, [REDACTED] [REDACTED] [REDACTED]

[REDACTED] Defendants shall forfeit all right, title, and interest in any and all property to the United States pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. §§ 1594(d)(1) and (2), which states:

**18 U.S.C. § 1594 General Provisions**

**(d)** The Court, in imposing sentence on any person convicted of a violation of this chapter, shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that such person shall forfeit to the United States—

- (1) such person's interest in any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and
- (2) any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

II.

**Coercion and Enticement of a Minor Forfeiture Statues**  
**[18 U.S.C. § 2428]**

As a result of the foregoing criminal violation set forth in Count Ten, the United States gives notice that it intends to forfeit any and all property from Defendants **KHALIL S. MAXWELL (1), [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]** Defendant shall forfeit all right, title, and interest in any and all property to the United States pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 2428, which states:

**18 U.S.C. § 2428. Forfeitures**

**(a) In general.**— The Court, in imposing sentence on any person convicted of a violation of this chapter, shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that such person shall forfeit to the United States—

- (1)** such person's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and;
- (2)** any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

**(b) Property subject to forfeiture.—**

**(1) In general.**— The following shall be subject to forfeiture to the United States and no property right shall exist in them:

- (A)** Any property, real or personal, used or intended to be used to commit or to facilitate the commission of any violation of this chapter.
- (B)** Any property, real or personal, that constitutes or is derived from proceeds traceable to any violation of this chapter.

III.

**Receipt of a Visual Depiction Involving the Sexual  
Exploitation of a Minor Forfeiture Statues**  
[18 U.S.C. § 2253]

As a result of the foregoing criminal violation set forth in Count Eleven, the United States gives notice that it intends to forfeit any and all property from Defendants **KHALIL S. MAXWELL (1)**, [REDACTED] Defendant shall forfeit all right, title, and interest in any and all property to the United States pursuant to FED. R. CRIM. P. 32.2 and 18 U.S.C. § 2253, which states:

**18 U.S.C. § 2253. Criminal Forfeiture**

**(a) Property subject to criminal forfeiture.**— A person who is convicted of an offense under this chapter involving a visual depiction described in section 2251, 2251A, 2252, 2252A, or 2260 of this chapter or who is convicted of an offense under section 2252B of this chapter,<sup>1</sup> or who is convicted of an offense under chapter 109A, shall forfeit to the United States such person's interest in—

- (1) any visual depiction described in section 2251, 2251A, or 2252<sup>2</sup> 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

**IV.**  
**Property**

Any and all property constituting, or derived from, any proceeds the Defendants obtained, directly or indirectly; any of the Defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation; and any property real or personal, involved in the offense(s), or any property traceable to such property.

**V.**  
**Money Judgment**

A sum of money that represents the amount of proceeds obtained, directly or indirectly, property involved in such offense, or traceable to such property as a result of the violations set forth in Counts One through Eleven and Count Thirteen for which Defendants **KHALIL S. MAXWELL (1)**, [REDACTED] are individually liable.

**Substitute Assets Provision**

If any of the above-described forfeitable property, as a result of any act or omission of the Defendant:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said Defendant up to the value of the above forfeitable property.

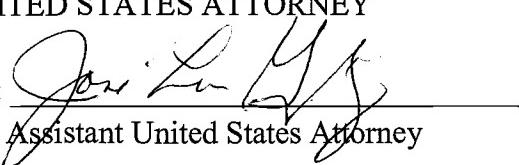
A TRUE BILL  
ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

---

FOREPERSON OF THE GRAND JURY

JOHN F. BASH  
UNITED STATES ATTORNEY

BY:



\_\_\_\_\_  
Assistant United States Attorney